

# Milbank

## SEAN M. MURPHY

*Partner*

55 Hudson Yards | New York, NY 10001-2163  
T: 212.530.5688  
smurphy@milbank.com | milbank.com

March 26, 2021

### **VIA ECF**

Hon. Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Yang v. Trust for Advised Portfolios et al., 1:21-cv-01047-FB-RLM*

Dear Judge Mann:

We represent Infinity Q Capital Management, LLC and Leonard Potter in the above-captioned action and write pursuant to Your Honor's Individual Rules to respectfully request a stay of time to answer, move against, or otherwise respond to any complaint in this action, as detailed in the enclosed Stipulation and [Proposed] Order Regarding Time to Respond to Complaint. This is the first request for such relief and Plaintiff consents to the request.<sup>1</sup>

Respectfully Submitted,

/s/ Sean M. Murphy

Sean M. Murphy

cc: All counsel of record (via ECF)

---

<sup>1</sup> This proposed stipulation was previously filed with Judge Block, and on March 25 the Court denied the motion “without prejudice to re-file their application addressed to MJ Mann who will be handling all pre-trial matters in this litigation.” (Electronic Order, Mar. 25, 2021).

MILBANK LLP

NEW YORK | LOS ANGELES | WASHINGTON, D.C. | SÃO PAULO | FRANKFURT  
LONDON | MUNICH | BEIJING | HONG KONG | SEOUL | SINGAPORE | TOKYO